

# GHAJAR EXHIBIT 43

11/21/2024

Richard Kadrey, et al. v. Meta Platforms, Inc. Yann LeCun, Ph.D.  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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IN RE MATTER OF:	)
RICHARD KADREY, et al.,	)
Plaintiff,	)
vs.	) C.A. NO.:
META PLATFORMS, INC.,	) 3:23-cv-03417-VC
Defendant.	)

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VIDEOTAPED DEPOSITION OF YANN LeCUN, Ph.D.

Palo Alto, California

Thursday, November 21, 2024

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UNDER THE PROTECTIVE ORDER

Stenographically Reported by:

HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR

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1           Would you please state your business  
2   address for the record.

3           A.   Business address is the Farley Building in  
4   New York City.

5           Q.   And is there a more specific address street  
6   number?

7           A.   I believe it's on 33rd Street, but I can't  
8   remember the number.

9           Q.   Fair enough.

10                   And what is your current title?

11           A.   Chief AI scientist.   That's one of my two  
12   jobs.   I'm also a professor at New York University.

13           Q.   And when we say -- you're a chief AI  
14   scientist for Meta Platforms, Inc.; is that right?

15           A.   Yes.

16           Q.   And can we refer to it today as "Meta"?

17           A.   Yeah.

18           Q.   All right.

19                   And you're also a professor at NYU.   Is  
20   that also a full-time job?

21           A.   They're both part time.

22           Q.   Have you had your deposition taken before?

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1 Q. Have you provided your attorneys with any  
2 documents in this case?

3 A. No.

4 Q. Okay.

5 Have you been asked to provide your  
6 attorneys with any documents?

7 A. No.

8 Q. And have you had the same job at Meta the  
9 whole time you've been there?

10 A. No. I had two jobs.

11 Q. Okay.

12 Let's go through that. What -- what was  
13 the job you were hired to do?

14 A. My first job title was director of AI  
15 research, so director of the FAIR organization which  
16 at the time, in Facebook AI Research, which I had  
17 for four years, from late 2013 to early 2018.

18 And then since then, I've been chief AI  
19 scientist so I'm no longer a manager. I'm actually  
20 what's called an individual contributor and so I  
21 don't have any reports, at least no permanent  
22 full-time employees such as students and things like

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1 this, but no -- no direct reports so -- so my impact  
2 on the company is purely intellectual, not  
3 managerial or operational.

4 Q. And to whom do you report?

5 A. Chris Cox, Chief Product Officer.

6 (Stenographer clarification.)

7 Q. (By Ms. Geman) Has that been true for the  
8 last four years?

9 A. No, that's only been true for the last  
10 year.

11 Q. Okay.

12 A. Before that, my direct manager was Michael  
13 Abrash who's in charge of reality --

14 (Stenographer clarification.)

15 THE WITNESS: -- labs research, RLR,  
16 because FAIR was under reality labs research and  
17 then a year ago, FAIR was moved to Chris Cox's  
18 organization which is called FOA, family of apps.

19 And then before that, I was reporting to  
20 Jerome Pesenti --

21 Q. (By Ms. Geman) Um-hum.

22 A. -- who was VP of AI.

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1 agree that that's consistent with the idea that  
2 books are useful to LLaMA for cultural relevance?

3 MR. WEINSTEIN: Object to form.

4 THE WITNESS: I mean, they can -- they  
5 could be useful for a lot of different things, but,  
6 again, what precisely is not clear.

7 Q. (By Ms. Geman) So let me ask this  
8 question: You say books could be useful to LLaMA  
9 for lots of different things. What is your  
10 understanding of how books, in fact, have been  
11 useful for LLaMA?

12 A. I don't know.

13 Q. Okay.

14 You received the Turing Award; correct?

15 A. Correct.

16 Q. And what was that for?

17 A. This was for fundamental contributions to  
18 deep learning, particularly --

19 (Stenographer clarification.)

20 THE WITNESS: -- convolutional neural  
21 networks. It's an exotic word.

22 But more generally for essentially showing

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1 MR. WEINSTEIN: Object to form.

2 Q. (By Ms. Geman) Okay. All right.

3 And have you -- have you been in any  
4 discussions at Meta about outreach to or agreements  
5 with companies that possess large swaths of data for  
6 use for Meta's LLMs?

7 MR. WEINSTEIN: Object to form. Lacks  
8 foundation.

9 THE WITNESS: No.

10 Q. (By Ms. Geman) And do you ever -- are you  
11 ever in meetings about the -- about -- well, let me  
12 back up.

13 What sort of regular meetings do you have  
14 at Meta? Like, I don't think we've kind of gone  
15 through what your current functions are as opposed  
16 to your job title.

17 A. Maybe we should have started with this. So  
18 I'm a chief AI scientist which means I'm a  
19 scientist, so I don't deal with products. I work  
20 with various research teams within FAIR, which means  
21 now fundamental AI research, and what we work on  
22 primarily is the next generation AI systems. So

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1 we're not working on LLMs.

2 In fact, I've said -- I've said publicly  
3 multiple times in recent months that my advice to  
4 people getting into the field is to not work on  
5 LLMs. The reason being that LLM is now a topic of  
6 product developments and technology and is in the  
7 hands of large industry players, like Meta and  
8 Google, Microsoft, OpenAI, et cetera, and if you are  
9 a researcher or scientist particularly in academia,  
10 there's no point actually you working on this at  
11 all.

12 And at FAIR, we are not working on LLMs.  
13 We used to. We got the -- the LLaMA project started  
14 in late 2022, but since then, it's been in the hands  
15 of the newly created product group called GenAI and  
16 that has allowed FAIR to refocus its efforts on  
17 longer term research which does not include LLM.

18 So my day-to-day work is to talk to  
19 individual scientists, talk to groups of scientists  
20 that are working on particular projects and then  
21 more generally advise the scientists and engineers  
22 at FAIR generally, but particularly broadly in the



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1 company, to focus on projects that I think are  
2 promising for the future and I largely stay out of  
3 anything related to LLM and, in fact, natural  
4 language processing as a whole.

5 Q. When did you last work on LLaMA?

6 A. I never worked on LLaMA.

7 Q. Didn't you say you worked on LLaMA 1?

8 A. No, I didn't.

9 Q. Okay.

10 A. FAIR worked on LLaMA 1.

11 Q. FAIR worked on LLaMA 1. Okay.

12 A. But -- but I was already chief scientist  
13 and not involved in this.

14 Q. Okay.

15 And have you ever been part of GenAI?

16 A. No.

17 Q. Okay.

18 You report to -- you presently report to  
19 Chris Cox though; correct?

20 A. Correct.

21 Q. Okay.

22 Who else reports to him regarding AI

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1 a copy of that?

2 MS. GEMAN: Oh, yeah.

3 Q. (By Ms. Geman) Who is Nikolay Bashlykov?

4 A. I don't know.

5 Q. Have you ever met him?

6 A. I don't think so.

7 Q. Do you know who Hugo Touvron is?

8 A. Oh, yes.

9 Q. Who is he?

10 A. He's a research scientist at -- formerly at

11 FAIR and now at GenAI in Paris.

12 Q. What's the sort of relationship between the

13 Paris FAIR and GenAI and the U.S. FAIR and GenAI?

14 A. Well, I created FAIR Paris. The history of

15 it, so FAIR was created in late 2013. FAIR Paris

16 was created in spring 2015 and grew to about 100

17 people.

18 And then in early 2023 when GenAI was

19 created, the -- the nucleus of the engineering team

20 from GenAI was formed by something like 60 or 70

21 people from FAIR who were moved to GenAI, basically

22 were asked to join GenAI as the nucleus of the

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1 engineering team, and Hugo was part of that.

2 I believe Hugo did his Ph.D. thesis at FAIR  
3 in Paris in residence and -- and then became a  
4 research scientist and then transferred to GenAI  
5 when GenAI was created.

6 Q. And what work does he do with LLMs, if you  
7 know?

8 A. Well, so he was part of the original team  
9 for LLaMA 1 and I believe he's actually the first  
10 author of the -- one of the papers. I'm not sure if  
11 he's the first author of --

12 (Stenographer clarification.)

13 THE WITNESS: -- LLaMA 1 or LLaMA 2. I  
14 know he's the first author on one of the -- on the  
15 technical papers for one of the LLaMA -- early LLaMA  
16 LLMs, but I can't remember if he's the first author  
17 for LLaMA 1. He was certainly part of the team.

18 Q. (By Ms. Geman) And have you worked with  
19 him personally?

20 A. No.

21 Q. Okay.

22 So have you seen earlier what's been marked

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1 I, HEATHER J. BAUTISTA, CSR No. 11600,  
2 Certified Shorthand Reporter, certify:

3 That the foregoing proceedings were taken  
4 before me at the time and place therein set forth,  
5 at which time the witness declared under penalty of  
6 perjury; that the testimony of the witness and all  
7 objections made at the time of the examination were  
8 recorded stenographically by me and were thereafter  
9 transcribed under my direction and supervision; that  
10 the foregoing is a full, true, and correct  
11 transcript of my shorthand notes so taken and of the  
12 testimony so given;

13 (XX) Reading and signing was not requested/offered.

14 I further certify that I am not financially  
15 interested in the action, and I am not a relative or  
16 employee of any attorney of the parties, nor of any  
17 of the parties.

18 I declare under penalty of perjury under the  
19 laws of California that the foregoing is true and  
20 correct. Dated: November 26, 2024

21

22



HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR